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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Billed Party Preference ) CC Docket No. 92-77  
for 0+ InterLATA Calls )

AT&T'S REPLY IN OPPOSITION TO PETITIONS FOR RECONSIDERATION

Pursuant to the Commission's Public Notice dated February 24, 1993, American Telephone and Telegraph Company ("AT&T") submits its reply in opposition to the Petitions for Reconsideration of the Commission's November 6, 1993 Order ("Order").<sup>1</sup>

All of the commenters supporting the Operator Service Providers' ("OSPs'") petitions are OSPs or private payphone companies ("PPCs").<sup>2</sup> Neither these commenters nor the OSP petitioners themselves added any new facts or arguments to the two-year debate over the 0+ public domain proposal. As AT&T showed (AT&T's Opposition, pp. 3-4)

<sup>1</sup> Comments on the petitions were filed by the American Public Communications Council ("APCC"), Capital Network Systems ("CNS"), Intellicall, Inc., LinkUSA, Sprint Communications Co. ("Sprint"), One Call Communications Inc. and U.S. Long Distance ("USLD"). None of the commenters support Southwestern Bell's ("SWBT's") petition for reconsideration. APCC, CNS, Intellicall and USLD specifically oppose SWBT's position, which AT&T also opposed, for different reasons, in its March 11 filing ("AT&T's Opposition").

<sup>2</sup> Sprint's comments oppose the OSPs' petitions and express (p. 1) Sprint's "serious doubts" that the 0+ public domain proposal would be effective or desirable.

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petitions for reconsideration may not be granted merely for the purpose of re-arguing matters on which the Commission already deliberated and spoken.<sup>3</sup>

AT&T's Opposition also demonstrated that every issue disputed in the OSPs' petitions was fully supported by the evidence and findings in the record and that the Commission's rejection of the 0+ public domain proposal was in the public interest. The commenters' arguments provide no additional support for the petitioners' requests that the Commission conduct a wholesale reevaluation of its lengthy and carefully considered Order. Some of the commenters simply adopt or repeat the positions of one or more of the OSP petitioners.<sup>4</sup> The others focus their comments on particular arguments that were specifically rejected by the Commission.<sup>5</sup> In all events, none of the commenters presents

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<sup>3</sup> American Broadcasting Companies, Inc., 90 F.C.C.2d 395, 401 (1982). See also AT&T Long Lines, 64 F.C.C.2d 958 (1977).

<sup>4</sup> LinkUSA's comments (p. 2) "agree" with the arguments in the CompTel petition. USLD's comments repeat the arguments of the CompTel petition, which was prepared by the same counsel. AT&T's Opposition demonstrated that none of those arguments are consistent with the evidence and findings in the record. See also CNS, pp. 3-4, which "supports" the petitions of several OSPs. CNS also disputes, without providing additional information, the Commission's cost/benefit analysis which AT&T (pp. 5-11) showed was fully supported by the evidence in the record.

<sup>5</sup> See e.g. Order ¶ 55 (rejecting 0+ public domain, "We find consumer education...best balances the interests of AT&T's cardholders, AT&T's competitors, and AT&T"); Order ¶ 48 (on customer choice, customer has selected carrier of choice "before they reach the public telephone"); Order ¶¶ 21, 47-48 (on availability of alternative

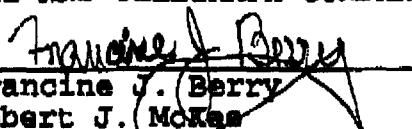
any argument the Commission has not already considered in detail and properly rejected.

Therefore, for the reasons stated above and in AT&T's Opposition, all of the petitions for reconsideration of the Commission's November 6, 1992 Order should be denied.

Respectfully submitted,

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(footnote continued from previous page)

billing mechanisms to AT&T CIID card, other billing mechanisms available including over 50 million LEC calling cards); Order ¶ 63, (intraLATA competition issues are beyond the scope of the issues in this proceeding).

CERTIFICATE OF SERVICE

I, Valerie Harris, hereby certify that on this 29th day of March, 1993, a true copy of the foregoing "AT&T'S Reply In Opposition To Petitions For Reconsideration" was served by first class mail, postage prepaid, upon the parties on the attached list.

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